

Message Text

LIMITED OFFICIAL USE

PAGE 01 MADRID 02229 251646Z
ACTION TRSE-00

INFO OCT-01 EUR-12 ISO-00 L-03 EB-08 /024 W
-----260627Z 105034 /10

R 251221Z MAR 77
FM AMEMBASSY MADRID
TO SECSTATE WASHDC 9501

LIMITED OFFICIAL USE MADRID 2229

FOR TREASURY AND STATE (L/T, EUR/WE)

E.O. 11652: N/A
TAGS: EFIN, SP
SUBJECT: US-SPANISH DOUBLE TAXATION TREATY

REF: MADRID 2190

1. DURING THE COMPARISON OF RETYPED TEXTS ON MARCH 25,
FOUR POINTS WERE RAISED:
A) THE NAME TO BE USED FOR THS SPANISH STATE IN THE
TITLE AND PREAMBLE TO THE TREATY. QUOTE GOVERNMENT OF
SPAIN END QUOTE WAS DECIDED ON, SUBJECT TO APPROVAL
BY SPANISH FOREIGN MINISTRY.
B) LAST THREE ARTICLES OF THE TREATY NEEDED TO BE
RENUMBERED, AND THIS WAS AGREED ON.
C) U.S. SIDE WILL REEXAMINE DEFINITION OF FINANCIAL
LEASE, AND ADVISE GOS.
D) SPANISH SIDE ASKED TO REVISE ARTICLE 14 TO EXPAND
COVERAGE FROM "INDIVIDUALS" TO RESIDENTS (INDIVIDUAL
OR CORPORATE). US SIDE WILL ADVISE WHETHER THIS IS
ACCEPTABLE.

2. DEL ARCO INFORMED US THAT GOS CAN PREPARE A SPANISH
LANGUAGE TEXT IN ONE WEEK, AND WILL DO THIS AFTER
THE REMAINING TWO POINTS ARE RESOLVED. MEANWHILE
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MINFIN WILL SEND THE PRESENT TEXT TO MFA FOR INTERNAL
REVIEW. EATON

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NNN

Message Attributes

Automatic Decaptioning: X
Capture Date: 01-Jan-1994 12:00:00 am
Channel Indicators: n/a
Current Classification: UNCLASSIFIED
Concepts: AGREEMENT DRAFT, POLICIES, TEXT, TAX AGREEMENTS, AMENDMENTS
Control Number: n/a
Copy: SINGLE
Sent Date: 25-Mar-1977 12:00:00 am
Decaption Date: 01-Jan-1960 12:00:00 am
Decaption Note:
Disposition Action: RELEASED
Disposition Approved on Date:
Disposition Case Number: n/a
Disposition Comment: 25 YEAR REVIEW
Disposition Date: 22 May 2009
Disposition Event:
Disposition History: n/a
Disposition Reason:
Disposition Remarks:
Document Number: 1977MADRID02229
Document Source: CORE
Document Unique ID: 00
Drafter: n/a
Enclosure: n/a
Executive Order: N/A
Errors: N/A
Expiration:
Film Number: D770104-0247
Format: TEL
From: MADRID
Handling Restrictions: n/a
Image Path:
ISecure: 1
Legacy Key: link1977/newtext/t19770322/aaaaasxt.tel
Line Count: 57
Litigation Code IDs:
Litigation Codes:
Litigation History:
Locator: TEXT ON-LINE, ON MICROFILM
Message ID: bd3dd0b1-c288-dd11-92da-001cc4696bcc
Office: ACTION TRSE
Original Classification: LIMITED OFFICIAL USE
Original Handling Restrictions: n/a
Original Previous Classification: n/a
Original Previous Handling Restrictions: n/a
Page Count: 2
Previous Channel Indicators: n/a
Previous Classification: LIMITED OFFICIAL USE
Previous Handling Restrictions: n/a
Reference: 77 MADRID 2190
Retention: 0
Review Action: RELEASED, APPROVED
Review Content Flags:
Review Date: 09-Mar-2005 12:00:00 am
Review Event:
Review Exemptions: n/a
Review Media Identifier:
Review Release Date: n/a
Review Release Event: n/a
Review Transfer Date:
Review Withdrawn Fields: n/a
SAS ID: 2998379
Secure: OPEN
Status: NATIVE
Subject: US-SPANISH DOUBLE TAXATION TREATY
TAGS: EFIN, SP, US
To: STATE
Type: TE
vdkgvwkey: odhc://SAS/SAS.dbo.SAS_Docs/bd3dd0b1-c288-dd11-92da-001cc4696bcc
Review Markings:
Margaret P. Grafeld
Declassified/Released
US Department of State
EO Systematic Review
22 May 2009
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